

Message

From: Ozone Implementation Team [no-reply@sharepointonline.com]
Sent: 6/22/2017 2:31:17 PM
To: Svingen, Eric [Svingen.Eric@epa.gov]
Subject: Discussion Forum - Call Notes for June

Call Notes for June has been added



Burkhart, Richard

6/22/2017 9:37 AM

Title: Call Notes for June

Body:

Call notes for call held on June 21, 2017:

1. Update on 2015 Ozone NAAQS Implementation Rule – Bob Lingard

Although the 2015 ozone NAAQS are on hold, the requirement for submittal of iSIPs in 2018 hasn't been delayed at this point.

Additionally, regarding the oil & gas CTG, we haven't heard that anything has changed with that, so state's still need to move forward with adoption of a regulation if applicable, or submittal of a negative declaration. The oil & gas CTG is required for the OTR states and 2008 ozone Moderate or higher classified areas.

2. Update on 2015 Ozone Designations – Denise Scott

Denise mentioned the extension notice for designations for the 2015 ozone NAAQS was signed today; it will be posted on our web-site soon.

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3. Remaining 2008 ozone Marginal areas – Butch

Regions, please check that the spreadsheet "status of remaining 2008 ozone areas" is updated; it's on the Ozone Implementation Sharepoint site. Some of the redesignation request submittals have proposed or final approvals.

4. Status of Regional actions on Moderate SIP submittals – Butch and the Regions

There is also a spreadsheet on the ozone sharepoint site for the moderate areas; Regions, please make sure it's up to date for your areas.

Butch noted that based on early preliminary 2017 data, quite a few of the Moderate areas are violating and also are no longer eligible for a 1-year attainment date extension. An APM call will be scheduled regarding how to handle these areas in the next week or two. Some of these SIPs for the Moderate requirement have come in, others haven't.

5. Status of Regions in meeting agreed upon final action dates in Consent decree for failure to act on 2008 ozone SIP submittals. – Butch and the Regions

Connecticut RACT signed on June 5, has been sent to HQ and is undergoing IBR review. Next set of due dates are in Region 9 for 2 RACT SIP submittals and an NSR submittal; Karen Bianco mentioned EPA has asked for a 30- day extension because the time between close of the comment period and taking final action by 7/31/2017 are rather tight; waiting to hear back from the litigant on that. Region 3 mentioned that they are likely to need more time for Delaware's RACT SIP, probably won't be able to meet September 30th, so an extension will likely be needed there.

6. PAMS in FREDS—Butch

Butch has modified the PAMS requirements in FRED to have the PAMS SIP required only once for an area and not required for each of the later NAAQS. The modification resulted from working with OGC and Region 9 on the NOIs for the 2008 ozone requirements. Butch provided a spreadsheet showing the duplicate PAMS requirements that were removed from FRED because the area had met the PAMS requirement for a previous ozone NAAQS. Region 9 discovered the state of CA PAMS submittal for all the the 1-hour ozone nonattainment areas NAAQS wasn't acted on; they are drafting an approval of it. Once an area meets the PAMS requirement, they don't need to do so again for subsequent NAAQS. Butch has the modified information in the public FREDS SIP Status Reports (SIP SR). The issue raised was for the St. Louis area that was reclassified to Serious & was re-designated to maintenance before the PAMS requirement was due. The SIP SR shows the latest action as Redesignation approved. At this time, there were no "serious for the first time" areas for the 2008 ozone standard, so there were no new PAMS obligations for the 2008 NAAQS. Butch forgot to mention the PAMS requirements in FRED and SIP SR will not show a SIP due date for PAMS because Section 182(c)(1) had an 18 months for PAMS rules but did not specify a SIP due date.

Butch and Region 9 are looking for a 9-2-1993 memo from G.T. Helms, entitled "Final Boilerplate Language for PAMS SIP Submittals" – Regions please check to see if you have a copy of this memo; if you find it, please send to Region 9, to Jeff Wehling, and a copy to Butch.

7. Re-designation Substitute in FREDS – Butch

Region 6 received and approved the redesignation substitutes for the Houston & Dallas areas for 1-hr and 1997 standard. Redesignation substitutes are only applicable for areas that were nonattainment at the time of revocation. FREDS will only add the fields for the redesignation substitutes SIPs to the areas screens for nonattainment areas at time of the NAAQS revocation. The Regions that have redesignation substitutes SIP can enter their information into FREDS. Region 3 has one redesignation substitute submittal for the VA part of the Washington area for the 1-hour standard; it's part of a multi-state area; the other two states didn't make a similar SIP submittal request. Karen mentioned that we've vacated the part of our 2008 implementation rule that had allowed a re-designation for one of the 8-hr ozone NAAQS (1997 or 2008 ozone NAAQS) to satisfy the anti-backsliding requirements for the 1-hour ozone NAAQS; other aspects of the 2008 ozone implementation rule are still in litigation.

8. Any new issues for the SIP issues data base? – All who have issues

Region 6 had a question about early implementation of contingency measures for state's outside the 9th circuit; they're working on a SIP that relies on this, and asked if it could be given green light status for areas outside of the 9th circuit. Karen mentioned that Arizona appealed that case to Supreme Court, so litigation isn't totally settled yet. OAQPS will check with Patrick Lessard & Jeff Wilcox on this. Region 1 mentioned Connecticut just submitted a draft attainment demonstration that also relies on already implemented measures to meet their contingency obligation.

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Question: No

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Posted by: Burkhart, Richard

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